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Via ECF

Honorable Judge Alvin K. Hellerstein
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Pizarro v. Euros El Tina Restaurant, et al.
Case No.: 20-cv-5783 (AKH)

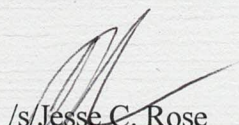
Dear Judge Hellerstein,

I write on behalf of my clients, Third Party Defendants Jose E. Castro and Eladio Castro Productions, Inc. to respond to the Defendants-Third Party Plaintiffs' request for an automatic stay under 11 USC § 362(a)(1).

Defendant Quezada's bankruptcy should have no effect on my clients' motions for Summary Judgment and Rule 11 sanctions (Dkt Nos. 204-207). By its plain language, the statute only applies to "proceeding[s] against the debtor." 11 USC § 362(a)(1). Here, the claims at issue are not against the debtor, Mr. Quezada, but rather against my client. Defendants have been frivolously prosecuting baseless claims against my clients for almost four years and now, right as my client is on the verge of having the claims dismissed, seek an improper stay. The Court should deny this improper request and the briefing schedule should continue as Ordered (Dkt. No. 212).

Thank You for Your Honor's time and attention to this matter. Should You have any additional questions or require additional submission we remain at Your disposal.

Respectfully Submitted,



/s/ Jesse C. Rose
Jesse C. Rose

cc: All Counsel. (Via ECF)